

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MUNICIPAL DERIVATIVES ANTITRUST LITIGATION)	MDL No. 1950
This Document Relates to:)	Master Docket # 08 Civ. 2516(VM)(GWG)
ALL ACTIONS)	

**CLASS PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
SETTLEMENT WITH DEFENDANTS JPMORGAN AND WELLS FARGO**

Class Plaintiffs hereby move for the following:

1. An Order granting final approval of the settlement agreement reached between Plaintiffs the City of Baltimore, MD, the University of Mississippi Medical Center, the University of Southern Mississippi, the Mississippi Department of Transportation, the University of Mississippi, the Central Bucks School District, and the Bucks Counter Water & Sewer Authority ("Plaintiffs"), individually and on behalf of the putative class of purchasers in this action (the "Settlement Class" or "Class"), and Defendant JPMorgan.

2. A Provisional Order granting final approval of the settlement agreement reached between Plaintiffs the City of Baltimore, MD, the University of Mississippi Medical Center, the University of Southern Mississippi, the Mississippi Department of Transportation, the University of Mississippi, the Central Bucks School District, and the Bucks Counter Water & Sewer Authority ("Plaintiffs"), individually and on behalf of the putative class of purchasers in this action (the "Settlement Class" or "Class"), and Defendant Wells Fargo, with a final Order granting final approval issuing no earlier than February 12, 2013.

3. That pursuant to the Wells Fargo Settlement Agreement, Wells Fargo will make a total cash payment of \$35,074,074 for the benefit of the Class; Wells Fargo has already paid \$20 million into the settlement fund, and will make an additional payment of \$15,074,074 within ten (10) business days after the Court's final approval of the Wells Fargo Settlement Agreement, in exchange for dismissal and releases by the Court of the claims of the Class against Wells Fargo.

4. That, pursuant to the JPMorgan Settlement Agreement, JPMorgan will make a total cash payment of \$42,646,428.57 for the benefit of the Class; JPMorgan has already paid \$24 million into the settlement fund, and will make an additional payment of \$18,646,428.57 by June 30, 2013 or within ten (10) business days after the Court's final approval of the JPMorgan Settlement Agreement is final, whichever date is later, in exchange for dismissal and releases by the Court of the claims of the Class against JPMorgan.

5. That the Settlement Classes be approved as set forth in the proposed orders attached hereto.

Therefore, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Class Plaintiffs respectfully request that the Court enter an Order for each settlement, in the form attached herewith as the Proposed Orders and Final Judgments, approving the Settlement Agreements and granting such other and further relief as may be appropriate.

This motion is supported by the Settlement Agreements; Class Plaintiffs' Memorandum of Law in Support of Motion for Final Approval, submitted herewith; the Affidavit of Megan E. Jones, submitted herewith; the Affidavit of Eric Miller, the Declaration of Katherine Lloyd, and all exhibits attached thereto; all pleadings filed in this case; and such additional evidence or

argument as may be presented to the Court. The Settling Defendants do not oppose the motion and seek the same relief as set forth therein.

Dated: November 14, 2012

Respectfully submitted,

/s/ Michael D. Hausfeld

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